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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 Sandra Wilson, individually;

10 Plaintiff,

11 vs.

12 Smith's Food & Drug Centers, Inc.; and DOES 1
13 through 100; and ROE CORPORATIONS 101
through 200,

14 Defendant(s).

Case No. 2:21-cv-01108-JCM-NJK

STIPULATION AND ORDER
TO EXTEND DISCOVERY DEADLINES

FIRST REQUEST

16 Plaintiff SANDRA WILSON ("Plaintiff") and Defendant SMITH'S FOOD & DRUG
17 CENTERS, INC. ("Defendant"), by and through their respective counsel of record, do hereby
18 stipulate to extend the discovery cutoff in the present case for a period of 75 days.

19 Pursuant to Local Rule 26-3, the parties hereby aver that this is the first such discovery
20 extension requested in this matter.

21 **DISCOVERY COMPLETED TO DATE**

- 22
- 23 • The parties have conducted an FRCP 26(f) conference and have served their
 - 24 • respective FRCP 26(a) disclosures;
 - 25 • The parties have served and responded to written discovery;
 - 26 • Defendant has deposed Plaintiff
 - 27 • Plaintiff noticed an FRCP 30(b)(6) deposition of Defendant
 - 28

**DISCOVERY TO BE COMPLETED AND
REASONS FOR EXTENSION OF DISCOVERY**

Discovery to be completed includes:

- Subpoena for additional medical records;
- Deposition of Defendant's Rule 30(b)(6) witnesses;

The parties aver, pursuant to Local Rule 26-3, that good cause exists for the requested extension. In particular, Plaintiff timely noticed Defendant's Rule 30(b)(6) deposition, but due to the holiday season, a Rule 30(b)(6) deposition at this time would be particularly burdensome. The parties have therefore agreed to conduct the deposition until after the New Year. Moreover, Plaintiff was deposed on December 8, 2021, during which proceeding it was learned that Plaintiff had misunderstood the scope of a written discovery request requiring her to identify prior medical providers. As a result, it is now evident that additional medical records from Plaintiff's medical history must be obtained as they bear on Plaintiff's damage claims in this case. An extension of seventy-five (75) days will allow sufficient time for counsel to obtain Plaintiff's prior medical records and conduct additional discovery necessitated from obtaining such documents.

NEW DISCOVERY DEADLINES

Discovery Cut-Off Date

Currently: December 21, 2021

Proposed: March 7, 2022

Dispositive Motion Deadline

Currently: January 20, 2022

Proposed: April 6, 2022

Joint proposed Pre-Trial Order

Currently: February 23, 2022, or 30 days after resolution of dispositive motions per

Local Rule 26-1(e)(5)

Proposed: May 6, 2022, or 30 days after resolution of dispositive
motions per Local Rule 26-1(e)(5)

If this extension is granted, all discovery mentioned above should be concluded within the stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED this 21st day of December, 2021

DATED this 21st day of December, 2021.

/s/ Ryan Kerbow
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: December 27, 2021